

AO 91 (Rev. 11/11) Criminal Complaint

Agent:

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Wayne Williams

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UNITED STATES DISTRICT COURT

for the

Eastern District of Michigan

United States of America

v.

Juan Manuel MORALES-SALINAS

Case: 2:25-mj-30131

Assigned To : Unassigned

Assign. Date : 3/11/2025

Case No.

Description: RE: JUAN MANUEL
MORALES-SALINAS (EOB)

CRIMINAL COMPLAINT

I, the complainant in this case, state that the following is true to the best of my knowledge and belief.

On or about the date(s) of March 5, 2025 in the county of Wayne in the
Eastern District of Michigan, the defendant(s) violated:*Code Section**Offense Description*

Title 8, United States Code, Section 1326(a)

Unlawful Re-entry after Removal from the United States

This criminal complaint is based on these facts:

On or about March 5, 2025, in the Eastern District of Michigan, Southern Division, Juan Manuel MORALES-SALINAS an alien from Mexico, was found in the United States after having been denied admission, excluded, deported, and removed therefrom on or about May 17, 2011, and not having obtained the express consent of the Attorney General of the United States or the Secretary of Homeland Security to re-apply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).

☒ Continued on the attached sheet.Sworn to before me and signed in my presence
and/or by reliable electronic means.Date: March 11, 2025City and state: Detroit, MI

Complainant's signature

Wayne Williams, BPA

Printed name and title



Judge's signature

David R. Grand, U.S. Magistrate Judge

Printed name and title

AFFIDAVIT

I, Wayne Williams, declare the following under penalty of perjury:

1. I am a Border Patrol Agent with the United States Department of Homeland Security, United States Border Patrol. I have been employed in this capacity since April 2014. Currently, I am assigned to the Detroit Border Patrol Station. The facts set forth herein are based upon my personal knowledge as well as information provided by other law enforcement officers to include Border Patrol Agents and record checks of law enforcement databases. I have also reviewed material from the official immigration file and system automated data relating to Juan Manuel MORALES SALINAS, which attests to the following:
2. Juan Manuel MORALES SALINAS is a thirty-four-year-old male, native and citizen of Mexico, who last entered the United States on an unknown date, at an unknown place, without being inspected and admitted or paroled by an immigration officer.
3. On or about October 14, 2003, MORALES SALINAS was arrested in La Joya, Texas for evading arrest. On March 12, 2004, prosecution was deferred, and MORALES SALINAS was sentenced to six months of probation.
4. On August 26, 2009, police in Detroit, Michigan arrested MORALES SALINAS for a traffic offense. A warrant was requested from the prosecutor and the disposition remains unknown.
5. On February 1, 2010, MORALES SALINAS was convicted of a traffic offense in Taylor, Michigan and sentenced to 15 days in jail and a fine of \$205.00.
6. On April 17, 2011, police in Melvindale, Michigan arrested MORALES SALINAS for Motor Vehicle – Operated Without Security, which was dismissed by the 24th District Court on October 29, 2015.
7. On or about May 3, 2011, MORALES SALINAS was arrested by Border Patrol Agents near Romulus, Michigan. He was served with a Form I-862, Notice to Appear, for removal proceedings.
8. On or about May 10, 2011, an immigration judge in Detroit, Michigan ordered MORALES-SALINAS removed from the United States to Mexico.

9. On or about May 17, 2011, MORALES SALINAS was removed to Mexico via Laredo, Texas.
10. On or about July 14, 2021, MORALES SALINAS was arrested in Lincoln Park, Michigan for driving while license suspended, improper plates, and no insurance. On July 14, 2021, the 25th District Court issued a warrant after MORALES SALINAS failed to appear for a hearing.
11. On or about April 19, 2024, the 23rd District Court in Taylor, Michigan issued a bench warrant for a civil infraction involving MORALES SALINAS.
12. On or about March 5, 2025, Border Patrol Agents assigned to an intelligence group were conducting surveillance near the residence where MORALES SALINAS was believed to reside. Agents observed an individual matching the physical description of MORALES SALINAS exit the residence and enter the driver seat of a red-colored Ford pickup truck. Agents initiated a vehicle stop to identify the driver based on the reasonable suspicion that this individual matched the description of the person seen exiting the location associated with MORALES SALINAS.
13. MORALES SALINAS identified himself and stated that he was a citizen and national of Mexico and admitted to being illegally present in the United States. Agents arrested MORALES SALINAS and transported him to the Detroit Border Patrol Station for processing.
14. The aforementioned arrest and subsequent detention was an administrative, non-criminal action made pursuant to the authority found in sections 1357, 1225, 1226, and/or 1231 of Title 8, United States Code to arrest and detain any alien entering or attempting to enter the United States, or any alien present in the United States, who is reasonably believed to be in violation of any law or regulation regulating the admission, exclusion, expulsion, or removal of aliens.
15. MORALES SALINAS' fingerprints and photograph were captured and entered into the Automated Biometric Identification System (IDENT) and the Integrated Automated Fingerprint Identification System (IAFIS). The results revealed that MORALES SALINAS is a citizen of Mexico who has been previously removed from the United States.
16. Review of records from the Alien File for MORALES SALINAS and queries in U.S. Department of Homeland Security databases confirm that no record exists of

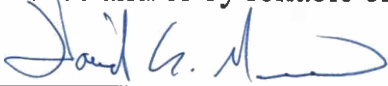
MORALES SALINAS obtaining permission from the Attorney General or the Secretary of the Department of Homeland Security to re-apply for admission to the United States following his last removal on or about May 17, 2011.

17. Based on the above information, there is probable cause to believe that, on or about March 5, 2025, in the Eastern District of Michigan, Southern Division, Juan Manuel MORALES SALINAS, an alien from Mexico, was found in the United States after having been denied admission, excluded, deported, or removed therefrom on or about May 17, 2011, at or near Laredo, Texas, and had not obtained the express permission from the Attorney General of the United States or from the Secretary of Homeland Security to reapply for admission thereto; in violation of Title 8, United States Code, Section 1326(a).



Wayne Williams, Border Patrol Agent
U.S. Department of Homeland
Security

Sworn to before me and signed in my
presence and/or by reliable electronic means.



Honorable David R. Grand
United States Magistrate Judge

March 11, 2025